ATTACHMENT E – NOTICE OF INTENT

ORDER WQ 2014-0174-DWQ
GENERAL PERMIT NO. CAG990002

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO WATERS OF THE UNITED STATES

I. NOTICE OF INTENT STATUS *(See Instructions)*

MARK ONLY ONE ITEM	1.☒ New Discharger 2.☐ Existing Discharger 3.☐ Change of Information: WDID # _____ 4.☐ Change of ownership or responsibility: WDID# _____

II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

A. Name Verizon Wireless, Inc.			Owner/Operator Type (Check One) 1.☐ City 2.☐ County 3.☐ State 4.☐ Gov. Combo 5.☒ Private
B. Mailing Address 15505 Sand Canyon Avenue, Building D			
C. City Irvine	D. County Orange	E. State CA	F. Zip Code 92618
G. Contact Person Myrna Allende	H. Title Engineer III Spec-RE/Regulatory Network - Implementation		I. Phone (949) 286-7442
J. Email Address myrna.allende@VerizonWireless.com			

☐ **Additional Owners** _____

III. BILLING ADDRESS (Enter information only if different from II. above)

Send to: ☐ **Owner/Operator** ☐ **Other**	A. Name		B. Title	
	C. Mailing Address			
D. City	E. County		F. State	G. Zip Code

IV. RECEIVING WATER INFORMATION

A. Attach a project map(s) that shows (1) the service area within the a specific Regional Water Board boundary and maps of(2) the corresponding major surface water(s) bodies and watersheds to which utility vault or underground structure water may be discharged. Map features must also include ASBS boundaries, MS4 discharge points to the ASBS, and major roadways.
B. Regional Water Quality Control Board(s) where discharge sites are located List the Water Board Regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, 3, (4) 5, 6, 7, 8, or 9:

V. LAND DISPOSAL/RECLAMATION

The State Water Resources Control Board's water rights authority encourages the disposal of wastewater on land or re-use of wastewater where practical. You must evaluate and rule out this alternative prior to any discharge to surface water under this Order.

Is land disposal/reclamation feasible for all sites? ☐ **Yes** ☒ **No**

Is land disposal/reclamation applicable to a portion of the total number of sites? ☐ **Yes** ☒ **No**

If **Yes** to one or both questions, you should contact the Regional Water Board. This Order does not apply if there is no discharge to surface waters. If **No** to either or both questions, explain:

Discharges are short term, small volume (average 0.5-15 gallons) on an emergency basis; following the procedures outlined in the PPP Plan.

VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in accordance with the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? ☒ **Yes** ☐ **No**

VII. TYPE OF UTILITY VAULT OR UNDERGROUND STRUCTURE (Check All That Apply)

☐ **Electric** ☐ **Natural Gas** ☒ **Telecommunications** ☐ **Other:** _____

VIII. POLLUTION PREVENTION PLAN CONTACT INFORMATION

Each Discharger is required to provide a copy of their PLAN with their completed NOI. The PLAN requirements are provided in Section VII.C.3 of the Order. In the space below, provide the contact information for the person responsible for the development of the PLAN.

A. Company Name	B. Contact Person		
Verizon Wireless, Inc.	Myrna Allende		
C. Street Address Where PLAN is Located	D. Title of Contact Person		
15505 Sand Canyon Avenue, Building D	Engineer III Spec-RE/Regulatory Network - Implementation		
E. City	F. County	G. State	H. Zip Code
Irvine	Orange	CA	92618
I. Phone	J. Email Address		
(949) 286-7442	myrna.allende@VerizonWireless.com		

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IX. DESCRIPTION OF DISCHARGE(S)

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.

Discharge will be small volume intermittent releases from vaults that pass pre-screening test prior to discharge. Pre-screening test are outlined in the Pollution Prevention Plan. Water may contain total suspended and total dissolved soils and minor concentrations of petroleum hydrocarbons as a result from roadway run-off.

X. REMINDERS

A. Have you included service territory/watershed map(s) with this submittal? Separate maps must be submitted for each Regional Water Board where a proposed discharge will occur.	☒ Yes	☐ No	
B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal?	☒ Yes	☐ No	☐ N/A
C. Have you included your PLAN?	☒ Yes	☐ No	

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XI. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

A. Printed Name: Laura Katke

B. Signature: L. Katke C. Date: 10/30/15

D. Title: Real Estate - Network PM

PLEASE SUBMIT THE NOI, FIRST ANNUAL FEE, PLAN, AND MAP
TO THE FOLLOWING ADDRESS:

UTILITY VAULTS NOI
NPDES UNIT
DIVISION OF WATER QUALITY
STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 100
SACRAMENTO, CA 95812-0100

STATE USE ONLY

WDID:	Regional Board Office	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: $	Check #:	

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Verizon Wireless Inc. (Verizon)

Pollution Prevention PLAN

for

Water Discharges from Utility Vaults/Subsurface Structures

IN COMPLIANCE WITH THE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO SURFACE WATERS
ORDER NO. 2014-0174-DWQ
NPDES NO. CAG990002

October 2015 (VzW PPP v.1)

Prepared for:
Verizon Wireless Inc.

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PLAN CERTIFICATION

I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name and Title: Laura Kafke - Network Real Estate PM

Date: 10/30/15

CONTACT INFORMATION

Plan Retained at Address:	15505 Sand Canyon Avenue Building D Irvine, California 92618
Contact and Mailing Address:	Myrna Allende Engineer III Spec-RE/Regulatory Network - Implementation 15505 Sand Canyon Avenue Building D Irvine, California 92618
24 Hour Emergencies:	1.800.386-9639 (Option #2)
Primary Contact Name:	Myrna Allende
Primary Contact Phone:	Office 949.286-7442
Primary Contact Email:	myrna.allende@VerizonWireless.com

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1.0 Introduction

1.1 General Overview

The State of California Water Resources Control Board (State Board) has regulatory authority for the protection of water quality under the US Federal Clean Water Act of 1972. The California Water Resources Control Board may issue National Pollutant Discharge Elimination System (NPDES) permits for the legal discharge of pollutants to surface waters of the United States. The State Board has developed an NPDES Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (General Permit CAG990002). The State Board allows utilities to apply for coverage under the General Permit with each Regional Water Quality Control Board (Regional Board) in which they have discharges to surface waters. Utilities must develop and implement a Pollution Prevention Plan (PLAN) which includes pollution prevention practices (PPP) designed to prevent or control the discharge of pollutants. The General Permit also requires utilities to develop and submit an annual monitoring report from representative number of utility vaults and to submit this report to each appropriate Regional Board.

Verizon, alike other utility providers within California, must discharge water from utility manholes, vaults, and other subsurface structures as a result of storm water inflow, subterranean seepage, inflow of other surface waters and/or condensate from air conditioning units. Discharges of this nature are a routine part of network operation and maintenance.

Vaults and underground structures may have small quantities of pollutants present due to the normal operation of equipment and roadway runoff. Numeric effluent limitations for pollutants from utility vaults and underground structures are not established.

This PLAN outlines the procedures and precautions that Verizon will follow to insure that water discharged from manholes, utility vaults and other subsurface structures do not degrade the quality of receiving surface waters.

1.2 Purpose

This PLAN has been prepared in accordance with the NPDES Permit for Discharges by Utility Companies to Surface Waters (NPDES No. CAG990002 and Order No. 2014-0174-DWQ) and covers short term intermittent discharges of pollutants to surface waters by Verizon. The procedures discussed within this PLAN are to insure that any pollutant concentrations in discharge do not result in a violation of any applicable water quality objective, or the degradation of receiving waters.

The PLAN will also insure that discharges do not cause acute or chronic toxicity to receiving waters. The PLAN is designed to comply with Best Available Technology and or Best Control Technology (BAT/BCT) to ensure compliance with Water Quality Standards. This PLAN shall be amended whenever there is a change in construction, operation, or maintenance procedures. Any PLAN amendment(s) should incorporate BAT/BCT and compliance with Water Quality Standards. It shall also be amended if

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deemed in violation of any conditions of this General Permit or has not achieved the general objective of controlling pollutants of discharges to surface waters. The amended PLAN shall be submitted to the appropriate Regional Water Quality Control Board. Any amendments shall be certified by Verizon.

This PLAN will describe and contain the following:

- Pollution Prevention Team
- Employee Training
- Types of Discharges
- Scheduled and Unscheduled Discharges
- Pollution Prevention Procedures
- Potential Pollutant Sources

1.3 Pollution Prevention Team

The Pollution Prevention Team (PPT) is led by Myrna Allende, Verizon Environmental Manager. Members of the PPT are responsible for developing the PLAN and assisting in its implementation, compliance and revision. Before working in underground structures, field technicians are properly trained to understand the importance of maintaining overall environmental stewardship of their workplace. Employee Training

Verizon will ensure that all employees and contractors involved with procedures of the General Permit are trained in aspects of the permit that impact their job function. Training will occur on an annual basis. The areas of training will include:

- Evaluation of discharge water within the vaults and underground structures
- Good housekeeping practices
- Preventive Maintenance
- Runoff controls
- Spill prevention and response
- Recordkeeping

Records of employee training within each Regional Board will be maintained electronically and available for inspection by SWRCB and Regional Board Personnel.

1.4 Types of Discharges

Discharges covered by this PLAN all originate as water trapped in subsurface structures. These subsurface structures can be broken into two distinct types, "dry" and "wet" structures. Both types of structures warrant authorized discharges and are related to Verizon's telecommunication network.

Overall, years internal maintenance and upgrades have reduced the total amount of purge water from dry and wet structures, thus the majority of these structures remain completely dry.

1.4.1 Wet Structures

Wet structures include manholes, vaults, hand holes, underground spaces (containing cables, cable connections, and signal enhances). Water that accumulates in these spaces will remain there until a worker must enter. The amount of discharge that must be released is dependant upon the dimensions of the structure and the depth of the water trapped within the structure. Typically, handholes vary in discharge volume from about 15 to 50 cubic feet, whereas but not limited to, manhole discharge volume are between 80 to 500 cubic feet. Most structures are of a size configuration that would not hold the maximum allowable purge volumes. Internal Verizon training programs and procedures insure that purge volumes remain below the maximum allowable volumes.

The water in wet structures is generally the result of trapped water from storm runoff, irrigation runoff and/or groundwater seepage. Typically, water from wet structures can contain trace amounts of hydrocarbons, oil and grease, fertilizers, organic matter, and other natural and artificial pollutants. Such pollutants are consistent with common storm and irrigation runoff events.

The normal operations within substructures do not produce contaminants. Sometimes repair or installation procedures may involve soldering to make electrical connections. These activities have the potential to add insoluble lead or other inorganics traces to the floor of structures. Verizon staff is trained to minimize and mitigate environmental impacts while conducting routine work tasks.

Other pollutants occasionally encountered that may effect the quality of water removed from wet structures include byproducts from microbial activity, silt, materials from illegal dumping by the public, and insoluble solids from surface runoff.

1.4.2 Dry Structures

Dry structures are usually climatically controlled spaces that contain switchgear, computers and electronics which are sensitive to environmental factors such as heat and moisture. Dry structures are usually air-conditioned to control equipment temperature and humidity. Air-conditioning equipment generates water condensate from the air that must be discharged. To keep dry structures free of excess moisture they are usually equipped with a sump that allows water to seep into the ground. Most dry structures have automatic sump pumps that actuate when the amount of accumulated water exceeds a given level in the sump; the sump water is then discharged from the dry structure.

1.5 Scheduled and Unscheduled Discharges

The majority of discharges from wet structures are unscheduled. A discharge is only warranted when a repair or maintenance crew arrives onsite to discover standing water

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inside the structure. Due to safety and logistical concerns, Verizon crews must remove the water.

The procedures used for field screening of trapped water prior to discharge is designed to allow workers to quickly determine if they can pump and release water from the structure to complete their tasks. Due to the critical nature of telephone communication repairs, work crews often have short deadlines to restore service. The screening procedure must be compatible with the public's business and economic needs.

Repairs are significantly delayed if water cannot be discharged due to the presence of pollutants. The field crew is instructed to call their supervisor and/or the Verizon environmental group for immediate assistance when water fails field screening. Depending on the nature of the contamination, there are several prearranged contractors available to remove and properly dispose of the contaminated water.

Unscheduled discharges from dry structures are less in volume than wet structure discharges. Dry structure discharges fluctuate depending on weather conditions. Provided the dry substructures are kept clean, dry structure discharges should be of adequate quality to have no significant effect on the quality of surface receiving waters.

1.5.1 Scheduled Discharges

Scheduled discharges from wet or dry structures are capable of control by the same methods described under Sections 2.2 and 2.3 of this document.

1.5.2 Reservoir Discharges

Reservoir discharges from wet or dry structures are capable of control by the same methods described under Sections 2.2 and 2.3 of this document.

1.5.3 Emergency Discharges

Emergency discharges from wet or dry structures are capable of control by the same methods described Sections 2.2 and 2.3 of this document.

In emergencies where service outages require intermediate attention the environmental department will select the fastest method to free the structure of water rather than the most cost effective.

In cases of wide spread disaster, Verizon will activate the Emergency Operations Center (EOC) for California. Environment specialists in communication with the EOC will expedite, prioritize, and provide material resources necessary to handle multiple sites.

In emergency situations involving an immanent threat to human life or substantial property loss field personnel have the authority to take whatever action is necessary to relieve the immediate threat including discharge of unscreened water. If practical, a sample of the discharged water would be taken and retained for screening. Telephone

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reports are to be provided to Verizon Global EH&S Compliance at the earliest possible opportunity, but NOT to exceed 24 hours of any unscreened emergency discharge. Fax a written report that details the nature, estimated quantity, and circumstances of the emergency discharge are to be submitted to Verizon Global EH&S Compliance following the verbal report.

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2.0 *Pollution Prevention Practices (PPP)*

Under the General Permit, inspection and evaluation of water contained in the underground structures is required before a determination can be made for Verizon personnel to discharge these waters to the receiving waters of the United States and the State of California. All waters that are contained in underground structures that do not pass the inspection and evaluation described below will be containerized and subsequently disposed of according to all applicable regulations. The operating procedures used for on-site testing of water in the underground structures must be simple and concise to allow workers to quickly determine if the water can be pumped from the structure. The following sections cover the inspection, evaluation, discharge procedures, and recordkeeping activities related to discharges under the General Permit.

2.1 When to Apply

The PPP only applies to water discharged to storm drainage systems, surface water, and/or land. The PPP is to be used only for short term intermediate discharge of water from manholes, hand holes, and utility vaults which must be drained to allow for work to safely proceed. The PLAN also addresses the control of pollutants discharged from automatically pumped sumps in vaults and other subsurface structures that must be kept free of water.

The PPP does NOT apply to discharges from:

- *Discharges from vehicle and equipment washing*
- *Runoff or discharge from vehicle maintenance*
- *Groundwater cleanup activities by utility companies.*
- *Utility service construction activities*
- *Discharges by utility companies that are dischargers and/or co-dischargers under Urban Area-wide Storm Water Permits*
- *Discharges to a sanitary sewer*
- *Building or property cleaning*
- *Facilities with existing NPDES permits*

2.2 Pollution Prevention Practices (Wet Structures)

Verizon discharge procedures are detailed in Appendices A through D and must be followed when pumping water trapped in manholes or other underground structures to surface or storm drainage systems.

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Failures of Verizon employees, to follow the screening and pumping procedures are not only a breach of Verizon policy, but are a violation of Federal and state law.

2.2.1 Screening Prior to Water Removal

Screening procedures summarized here are found in detail in Appendix A (*Verizon Manhole Waste Water Practice 122-622001).* Verizon uses two methods of screening, first human sensory/visual evaluation and secondly wastewater classifier strips. The strips are a product of J.V. Manufacturing Co. Inc. and distributed under the name *SPILLFYTER WasteWater Classifier.*

The SPILLFYTER WasteWater Classifier strips constitute the best available technology (BAT) economically achievable and best conventional pollutant control technology (BCI) to reduce pollutants and any more stringent controls necessary to meet water quality standards, as called for in the SWRCB Water Quality Order 2014-0174-DWQ. SPILLFYTER WasteWater Classifier strips also satisfy Sections 301 and 402 of the Clean Water Act. The current strip configuration tests for the presence or absence of:

- *Petroleum product and organic solvent risk(s)*
- *Iodine, bromine, chlorine risk(s)*
- *Nitrite risk*
- *Nitrate risk*
- *Fluoride risk*
- *Oxidizer Risk*
- *Acid/base risk*

If the manhole is found to contain sediment, first it is assessed to determine if work may resume without the need to remove. If sediment is present and must be removed, Verizon Global EH&S Compliance shall contract an outside hazardous material removal vendor to profile and dispose of the sediment in a manner compliant with Title 27 of the California Code of Regulations. Verizon policy is to avoid the deliberate pumping of water with high concentrations of un-dissolved solids into the storm water drainage system.

When discharging water from underground structures to a storm drain system or catch basin, Verizon field technicians should always make certain that the area is clean. Trash and debris in the vicinity shall be picked up and properly disposed of. If sediment exists around the storm drains, Verizon field technicians shall sweep the drainage path area to ensure that excessive sediment does not enter the storm drain system.

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2.2.2 Water Fails Screening

Water Screening Fails Due to NON-Hazardous Contaminants

Water fails screening because of non-hazardous contaminants such as sewage trash, mud, silt, garbage, and/or odor. This circumstance is to be handled by the workgroup. The supervisor of the workgroup will be responsible for the oversight and proper disposal of the material through one of the following two approved methods.

1) A licensed sanitary waste disposal company can be used to pump out the manhole and transport/dispose of the wastewater;

2) Pump the contaminated water into a properly labeled temporary storage container (e.g., 5-gallon bucket, baker tank, etc.) while work is completed, then immediately after completing the job, return the water to the underground structure.

Water Screening Fails Due to Contamination with Hazardous Contaminants

In the rare event that the water screening fails either the human sensory/visual evaluation and/or the wastewater classifier strip test the following measures shall be deployed.

- A telephone call will be made immediately to the **EHS 24-Hour Hotline at 1-800-386-9639, option number 2.** Verizon Global EH&S Compliance will be responsible for arranging disposal of the contaminated water using one of the appropriate approaches listed below.

    1) A licensed hazardous waste hauler will be contacted to transfer and dispose the water/sediment under manifest to an approved disposal site;

    2) Obtain a licensed operator of a portable water treatment system with a current NPDES permit issued by the Regional Board having local jurisdiction. The contractor will mobilize the water treatment system at the site of the manhole. After the water has been property treated, the water will be discharged under the contractor's permit(s).

2.2.3 *Local MS4 Discharge Notification Procedures*

Section II (E) of the General Permit requires Utilities to comply with specific MS4 notification requirements ["*Dischargers shall comply with any notification requirements of the MS4 permit(s) of any MS4 to which they discharge and shall follow the MS4 permit's notification protocols*"]. Verizon in commitment to these MS4 notification requirements will advise MS4s of potential discharges and the screening procedures outlined in this PLAN. On a case-by-case basis, Verizon Environmental Managers will advise Verizon field supervisors on specific MS4 jurisdictional discharge requirements.

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2.3 Pollution Prevention Practices (Dry Structures)

Pollution Prevention Practices for Dry Structures apply to any structure with an automatic or manually actuated sump pump that discharges water to the surface; except for the listed exclusions listed within Section 2.2. Locations that discharge to sanitary or industrial sewer systems are exempt from the permit requirements.

A representative sample of environmentally controlled vault discharges will be included in the Utility Vault Monitoring Plan devised for Verizon. These sampling results will be used as a screening tool to determine the range of concentrations of contaminants, if any, being discharged by these automatic sump pumps.

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3.0 *Potential Pollutant Sources*

3.1 Possible Pollution Sources

Possible Pollution Sources

The majority of the dry and wet structures are located within public areas. Verizon underground structures are located in roadways, parking lots, and right-of-way zones. These Verizon structures could become subject to spills from materials kept onsite. All Verizon materials stored onsite are kept and maintained in accordance with all local, state, and federal requirements.

A common list of materials used is shown below. There have been no significant spills or leaks within the past three years.

Table 1 - Potential Vault Pollutant Sources

Vault Location or Type	Significant Potential Source
Wet or Dry Dry Dry Wet	Discharge will be small volume intermittent releases from vaults that pass pre-screening test prior to discharge. Pre-screening test are outlined in this PLAN. Water may contain total suspended and total dissolved solids and minor concentrations of petroleum hydrocarbons as a result from roadway run-off.

3.2 Measures and Controls

Verizon staff ensures that internal procedures and training sessions maintain a high level of environmental awareness. Every facility maintains environmental records, practices spill prevention and response, and proper water discharge measures.

The staffs are trained to be a guardian of effective housekeeping procedures for their individual facility and work areas. Internal procedures include, but are not limited to:

1) Use good housekeeping in order to reduce the amount of waste stored at a site.

2) Return unopened containers to the manufacturer whenever possible.

3) Try to reduce the amount of waste created through careful handling and efficiently use of materials. Recycle and reuse products whenever possible.

4) Make sure that any wastes requiring special handling are identified in a manner that everyone working in the area knows how to safely use, manage, and store the substance.

5) Never mix wastes or chemicals.

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6) If you need advice on disposing of any waste, contact your Regional Global EH&S Compliance staff member or call the Verizon EHS 24-Hour Hotline at 1-800-386-9639, option number 2.

7) If you need advice on disposing of a hazardous waste, or have any suspicion that something may be hazardous or regulated, call Verizon EHS 24-Hour Hotline at 1-800-386-9639, option number 2.

8) Do not bring household hazardous wastes from home into the Verizon workplace.

Formal Verizon procedures for Hazardous and Solid Waste (Document 8211) and Manhole Water and Sediment Removal (Document 8517) are included in Appendix B.

3.3 Vector Control

Stagnant water serves as an attractant for mosquitoes whose larvae develop in such conditions. Water that has been allowed to stand for as little as four days can be attractive to mosquitoes. Verizon undertakes efforts to ensure there underground structures remain water tight and openings are sealed from the outside environment. For mosquito control, Verizon does not use chemical pesticides.

3.4 Spills and Reporting

Verizon field technicians are properly trained and equipped with materials needed to immediately handle a common spill or leak of hazardous materials. If the leak or spill were of significant size, Verizon would retain a local emergency response vendor.

Verizon field technicians are trained to call their supervisor and/or the **Verizon EHS 24-Hotline at 1-800-386-9639, option number 2** to report a spill or leak of hazardous pollutants. Additionally, spills shall be reported to the appropriate local agency, such as the fire department, to assist in cleanup at their discretion.

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FIGURES

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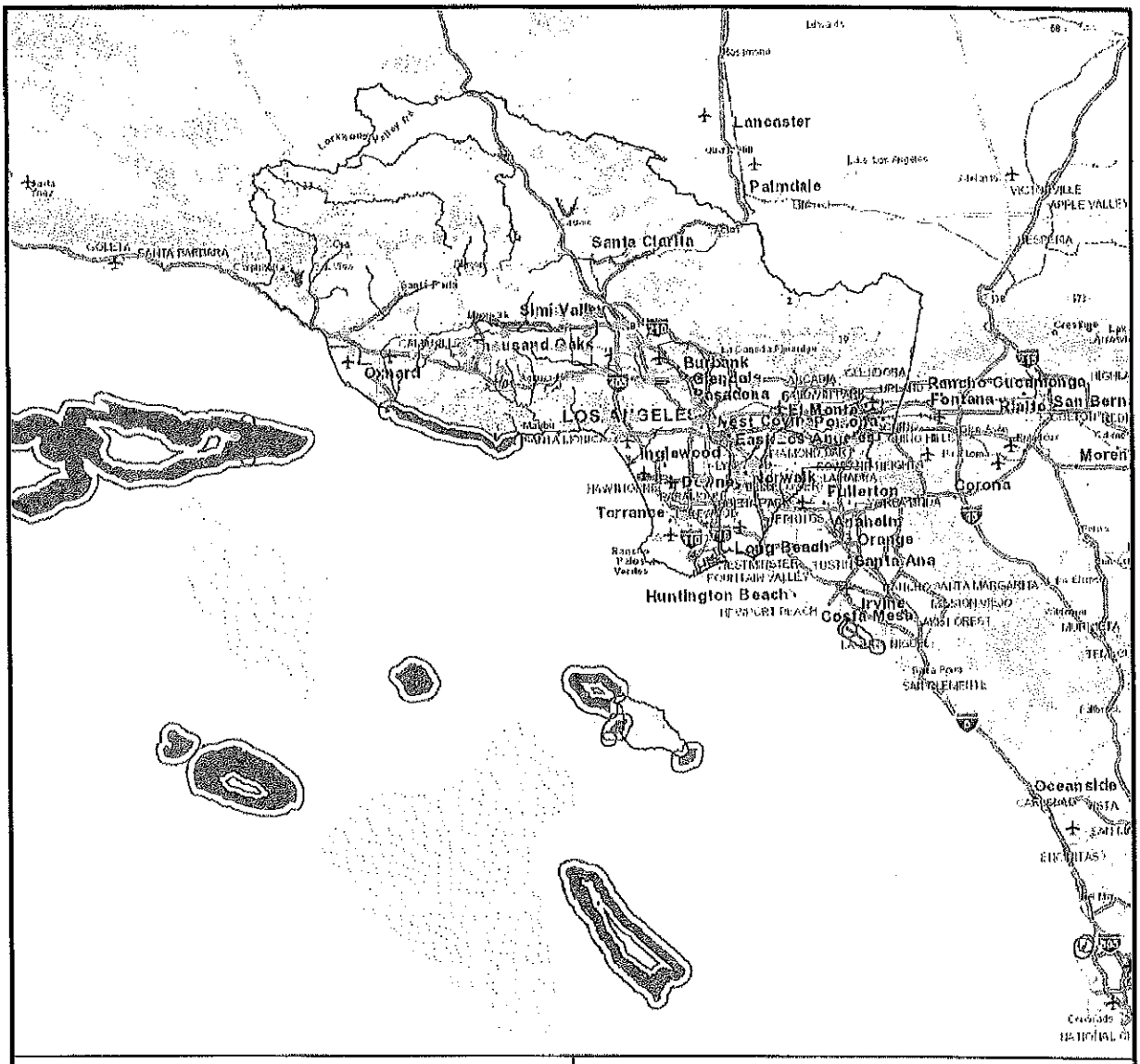

Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, IPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2013

1 in = 200 miles

0 25 50 Miles

Figure Group 4a. Verizon Wireless, Inc.
Los Angeles
Region 4 Drainage Maps-Overview

Underground Vault Location

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

4 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

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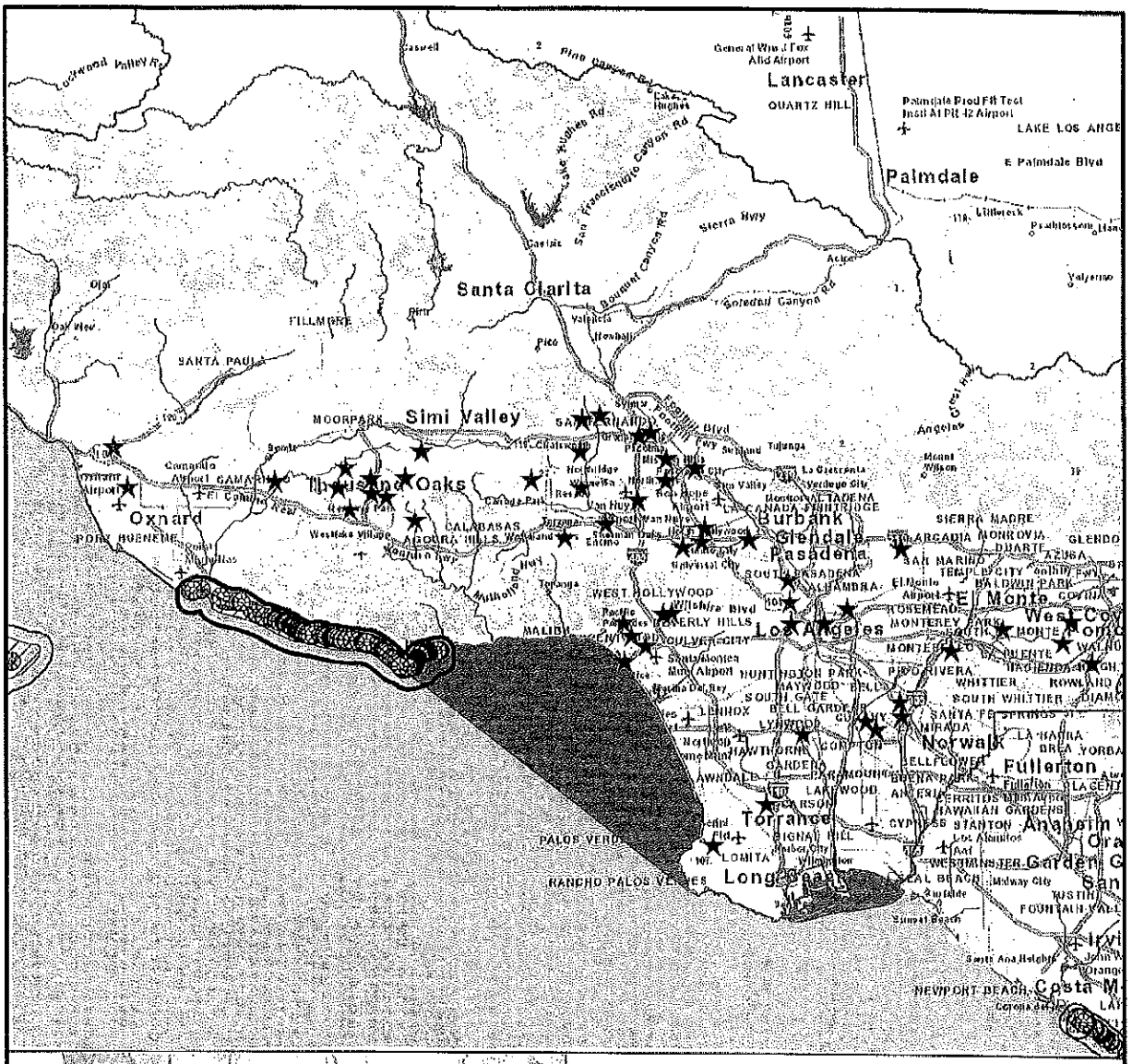

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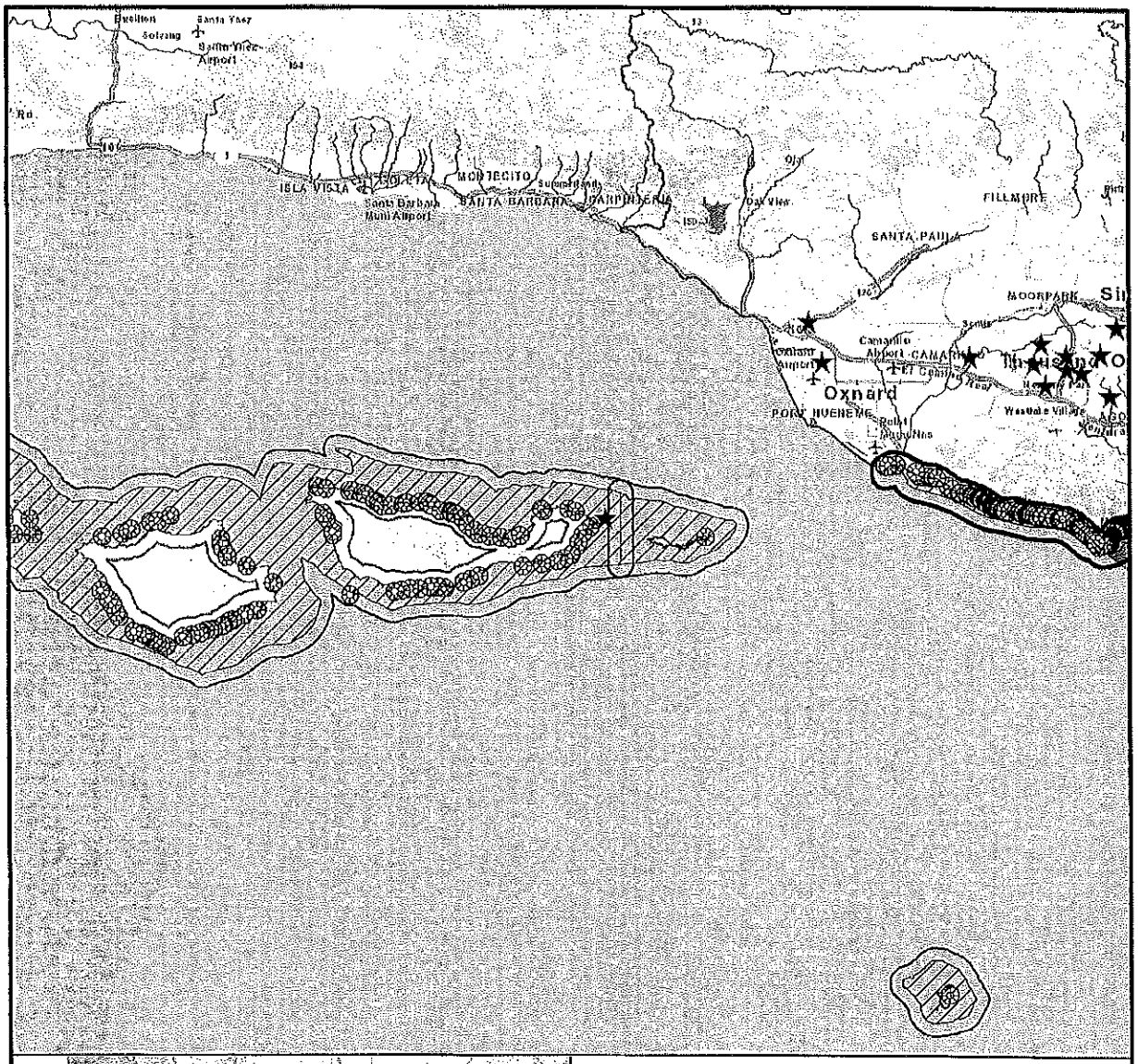

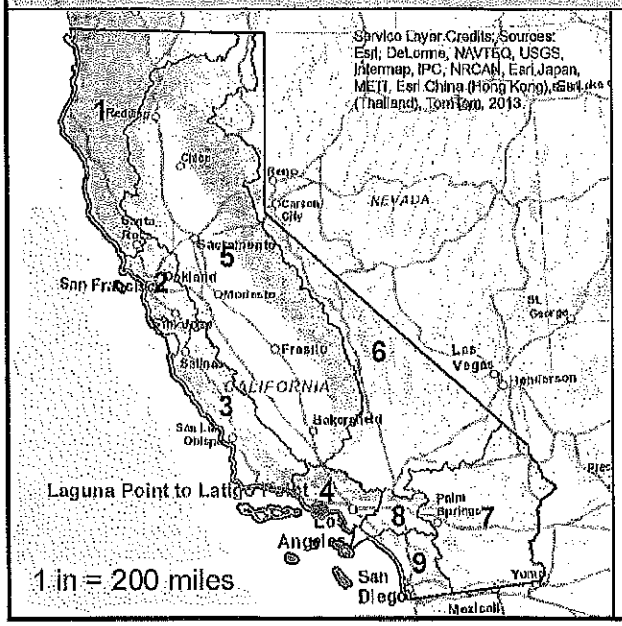

0 4 8 Miles

Figure Group 4c. Verizon Wireless, Inc.
Los Angeles Region 4
Drainage Maps - Anacapa Islands

- MS4 Location
- Underground Vault
- ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

- 4a 4b 5
- ASBS Location and Name
- 4 RWQCB Boundary and Number

*Locations within 100 feet of buffer included
ASBS = Area of Biological Significance

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APPENDIX A

Guidance Document for Field Staff on Manhole Waste Water

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Manhole Waste Water

Contents

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For use only by Verizon employees and approved contractors

1. General

1.1 Purpose

This practice provides instructions regarding:

- Use of the Waste Water Test Kit.
- Proper disposal of contaminated waste water.

1.2 Filing Instructions and Supersedures

File this practice in numerical order in your Verizon Telephone Operations practices set.

This practice supersedes and cancels:

- All policies, procedures, general instructions, letters, and memoranda which address this subject.
- Any document which provides information contrary to the information contained in this practice.

1.3 Responsibility

This practice was published by the Verizon Telephone Operations Administrative Services Department. For more information about this practice, contact the Headquarters Safety and Environmental Compliance Department.

1.4 Disclaimer

This practice was prepared solely for the use of Verizon Telephone Operations. It must be used only by its employees, contractors, customers and end users, when installing, operating, maintaining, and repairing Verizon Telephone Operations' equipment, facilities and services. Any other use of this practice is forbidden. The information contained in this practice may not be applicable in all circumstances and is subject to change without notice. By using this practice the user agrees that Verizon Telephone Operations will have no liability (to the extent permitted by applicable law) for any consequential, incidental, special, or punitive damages that may result.

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2. Overview

2.1 Introduction

Guidelines set forth in this practice must be followed in order to:

- Protect the safety and health of Verizon employees and the general public.
- Protect the environment from any damage resulting from contaminated waste water.
- Ensure that Verizon Telephone Operations is in compliance with all applicable environmental regulations.

2.2 Background

Water that seeps into vaults, manholes, and other underground structures may be contaminated with hazardous substances. Sources of contamination include:

- Leaking underground storage tanks.
- Leaking pipelines.
- Leaks or spills from local industry.
- Waste that was disposed of improperly.

Federal, state, and local environmental regulations prohibit pumping and discharging contaminated water:

- Into a storm drain, ditch, or other conveyance.
- Into a creek, stream, or other body of water.
- Onto a roadway.
- Onto the ground.

2.3 References

For additional information related to this practice, see Verizon Telephone Operations Practice 628-025-016, Underground Manholes – Testing and Verification Procedures.

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3. Waste Water Test Kit

3.1 Contents

The following chart lists items contained in the Waste Water Test Kit.

Description of Item	Item ID
Complete Waste Water Classifier Kit	581020
Waste Water Classifier Test Strips (20)	581021
Laminated Color Chart	581022
Plastic Box for Kit Contents	581023
Roll of Synthetic Thread	581024

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4. Test Kit Use

4.1 Instructions for Use

Use the Waste Water Test Kit to test the water found in vaults, manholes, and other underground structures before pumping the water from the structure.

The following chart outlines the waste water test procedure.

Step	Using the Waste Water Test Kit
1	Test and ventilate the manhole as described in Verizon Telephone Operations Practice 628-025-016.
2	Enter the following in the test log (see the chart below): • Date of the test. • Time of the test. • Manhole number or location address. • Your name or employee number.

If You Are In...	Then You Must Use...
Any location other than California	Form 90005280, Waste Water Test Log
California	Form 90006213, Test Log – Manhole and Underground Vault

3	Remove one test strip and the spool of twine from the test kit container.
4	Run twine through the hole in the test strip and secure.
5	Cut the twine to an appropriate length to allow the test strip to reach the bottom of the manhole.
6	Put on gloves or have a rag/paper towel available for holding the strip. **CAUTION: Because the waste water may be contaminated, avoid touching the test strip after it has been in the water.**

(continued)

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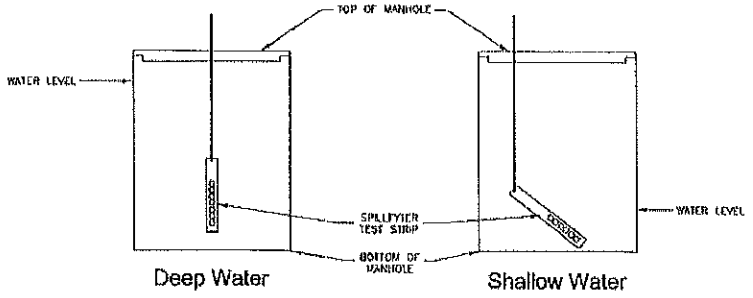
4.1 Instructions for Use, continued

Step	Using the Waste Water Test Kit
7	Lower the test strip into the manhole water, ensuring that all the test indicators are covered with water. **NOTE: In deeper water, stratification may occur. Lower the test strip well into the water to ensure that test indicators are exposed to the entire volume of water.**



8	Remove the test strip from the manhole and shake it to remove excess waste water. Do not touch the test strip to your bare skin.
9	Examine the test strip for visible evidence of contamination. **NOTE: Heavy oils can coat the test indicators and mask any color changes, but the color changes will be visible.**

If There is...	Then...
Visible evidence of contamination	• Enter *P* (for Present) in the test log under Visible Risk. • Contact your supervisor. • Do **not** pump the manhole.
No visible evidence of contamination	• Enter *NP* (for Not Present) in the test log under Visible Risk. • Proceed with the test.

(continued)

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4.1
Instructions for Use, continued

Step	Using the Waste Water Test Kit		
10	Compare the test indicators to the color chart provided in the Waste Water Test Kit, or use the guide printed on the test strip.		
	If for Test Number(s)...	**The Test Indicator Shows...**	**Then...**
	1 (Acid/Base Risk)	Strong Acid OR Strong Base OR	• Enter *P* (for Present) in the appropriate column in the test log.
	2-5 (Other Tests)	Any risk is present	• Contact your supervisor • Do **not** pump the manhole.
	1 (Acid/Base Risk)	Moderate Acid, Weak Acid, Neutral, OR Moderate Base AND	• Enter *NP* (for Not Present) in the appropriate column in the test log.
	2-5 (Other Tests)	No risk is present	• Proceed with pumping the manhole.

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5. Contaminated Waste Water

5.1 Introduction

All contaminated waste water must be disposed of according to federal, state, and local environmental regulations. In some cases, a report must be filed with the regulatory agencies. Failure to do so may result in substantial fines and/or penalties.

Contact the Verizon Area Environmental Compliance staff for further details on the disposal of contaminated waste water.

5.2 Disposal Contractors

All vendors/contractors used for transport, storage, and/or disposal of contaminated waste water must be:

- Permitted by federal and state environmental regulatory agencies.
- Approved Verizon contractors.
- Operating under a current contract or general agreement.

Contact the Verizon Area Environmental staff for a list of approved contractors.

5.3 Uniform Hazardous Waste Manifest

All waste water classified as hazardous that is being transported from a Verizon facility (including a manhole) to a vendor recycling or disposal facility must be accompanied by a Uniform Hazardous Waste Manifest.

5.4 Record Keeping

Environmental regulations require that copies of all shipping documents and manifests be retained by the generator.

- Send a copy of all manifests and shipping documents to the Verizon Area Environmental Compliance staff.
- Keep a copy of all manifests and shipping documents in a permanent file.

5.5 Verizon Area Environmental Compliance Staff

The Verizon Area Environmental Compliance staff is responsible for:

- Staying abreast of federal, state, and local environmental regulations.
- Corresponding with regulatory agencies concerning environmental activities.
- Maintaining records for all hazardous waste activities.
- Locating approved hazardous waste disposal contractors.

Forward copies of all information with environmental implications to the Area Environmental staff, including:

- Environmental permits.
- Correspondence with environmental regulatory agencies.
- Shipping documents/Uniform Hazardous Waste Manifests.

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5.6 Disposal Process

The following chart defines the process and responsibilities associated with contaminated waste water in manholes, vaults, and other underground structures.

Stage	Who	What
1	Employee who discovers the contamination	Contacts supervisor. Does **not** pump the contaminated waste water.
2	Outside Plant Supervisor	Contacts the Verizon Area Environmental Compliance staff: • For disposal instructions. • For a list of approved vendors. • To ensure that all reporting requirements are met.
3	Environmental Staff	• Provides technical guidance on disposal requirements. • Provides a list of approved vendors. • Contacts appropriate regulatory agencies, if necessary. • Contacts Risk Management to determine whether Verizon will pursue reimbursement from the source of the contaminations.
4	Outside Plant Supervisor	• Oversees the pumping and removal of contaminated waste water. • Maintains a copy of all disposal records in a permanent file. • Forwards a copy of all disposal records to the Area Environmental staff.
5	Environmental Staff	Maintains permanent disposal records.

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APPENDIX B

Guidance Document for Field Staff on Hazardous Waste and Solid Waste

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Hazardous and Solid Waste – Document 8211

General Information

Every industrial or commercial facility creates solid waste, as does every person and household. Solid waste includes everything from food scraps or disposable packing to wastewater sludge or used hazardous chemicals.

It is important to reduce the amount of waste we create. Once a material or product is paid for, it is economical to reuse it, or to use it as efficiently as possible, before throwing the material away or replacing it.

Industrial waste, both hazardous and non-hazardous, has high disposal costs. Companies have for pay for pickup and disposal of used oil, spent solvents, etc. Even domestic non-hazardous trash requires labor to collect and handle the trash, as well as tax dollars to finance the public collection and disposal system (usually landfilling). As existing landfills continue to fill up, towns, cities and counties find it more expensive to dispose of the normal trash that is put in the garbage.

Verizon's Environmental Affairs Organization (EAO) is responsible for managing all hazardous and regulated waste generated by Verizon's operations. This information sheet has been prepared to provide you with a basic overview of solid waste and hazardous waste rules.

Regulatory Requirements

There are varying rules for managing different types of solid waste. Under federal regulations, it must be determined whether any waste created at a facility is classified as "hazardous waste". There are specific rules that must be followed when storing, handling and disposing of hazardous waste. If unsure whether there is hazardous waste at a location, ask a supervisor or contact a regional Environmental Affairs staff member or contact the 24-Hour Safety, Health and Environmental (SH&E) Hotline on 1-800-386-9639.

Many types of solid waste may require special handling, such as residues from spill cleanups (used oil absorbent material), spent degreasers, used oil, oil filters, outdated chemicals, PCBs (capacitors, fluorescent light ballasts), batteries, mercury relays, lead, and other metal-containing materials. Before disposing of any of these, contact Environmental Affairs for guidance.

Under federal and state regulations, a waste is considered "hazardous" if it is specifically listed in the regulations, or if it is *ignitable, corrosive, reactive,* or *toxic*. Your supervisor or Verizon Environmental Affairs staff member can help you in determining whether a particular material is a hazardous waste.

In order to be hazardous waste, a material first has to be considered a "waste". Materials that will be recycled or reused are not wastes. Outdated chemicals, or cleanup residue from chemical spills, may be hazardous waste. Any facility where hazardous waste is created is called a "hazardous waste generator".

You should try to keep the amount of hazardous waste generated at your facility as small as possible. Hazardous waste is expensive to dispose of, and the more you generate, the more regulatory requirements you have to meet. You should also limit the amount of time hazardous waste is stored at your location. Regulations require most generators to ship their hazardous waste off site within 90 days, using licensed transporters and disposal firms.

Some state and local regulations are more stringent than the federal rules. Contact the regional Environmental Affairs staff member for the requirements in your area.

What you need to do:

1. Use good housekeeping to reduce the amount of waste stored at a site. Return unopened containers to the manufacturer whenever possible.

2. Try to reduce the amount of waste created through careful handling of materials and efficiently using products. Recycle and reuse products whenever possible.

3. Make sure any drum that contains hazardous waste is clearly labeled, kept closed, and is not leaking. Inspect drums on a weekly basis and document the inspection.

4. Make sure that any wastes requiring special handling are identified, and that everyone working in the area knows how to manage them. This applies to any chemicals, degreasers and petroleum products.

5. Never mix wastes.

6. If you need advice on disposing of any solid waste, contact your regional Environmental Affairs staff member or call the Safety, Health and Environmental (SH&E) Hotline on 1-800-386-9639, option 2.

7. If you need to dispose of a hazardous waste, or something that you think may be hazardous or regulated, call Verizon's 24-Hour SH&E Hotline at: 1-800-386-9639, option 2.

8. Don't bring household hazardous wastes from home into your workplace.

9. There are civil and criminal penalties for failure to promptly report spills that contaminate; <u>If in doubt, report it</u> by calling the Verizon 24-Hour SH&E Hotline at 1-800-386-9639, option 2.

24-Hour
Safety, Health and Environmental
Hotline
1-800-386-9639, option #2

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BE SAFE

SMART • AWARE • FOCUSED • EQUIPPED

InfoPoint 8211

Hazardous and Solid Waste

General Information

Solid waste includes everything from food scraps or disposable packaging to wastewater sludge or used hazardous chemicals. Every industrial or commercial facility creates solid waste. Solid waste may be classified as hazardous, regulated or non-hazardous. Hazardous and regulated wastes have higher disposal costs than non-hazardous waste.

Verizon's Global Environmental, Health and Safety Compliance (GEHS) group is responsible for managing all hazardous and regulated waste generated by Verizon's operations. This information sheet has been prepared to provide you with a basic overview of hazardous and regulated waste rules.

Regulatory Requirements

There are varying rules for managing different types of solid waste. In order to be hazardous or regulated waste, a material first has to be considered a "waste". Materials that will be recycled or reused are not wastes. Outdated chemicals, or cleanup residue from chemical spills, may be hazardous waste. Any facility where hazardous waste is created is called a "hazardous waste generator". Under federal regulations, it must be determined whether any waste created at a facility is classified as "hazardous waste" or "regulated waste". There are specific rules that must be followed when storing, handling, and disposing of hazardous or regulated waste. If unsure whether a waste is hazardous or regulated, ask a supervisor, contact a regional Global E,H&S consultant or contact the 24-Hour Global E,H&S Compliance Hotline at 1-800-386-9639.

Under federal and state regulations, a waste is considered "hazardous" if it is specifically listed in the regulations, or if it is *ignitable, corrosive, reactive,* or *toxic.* A Verizon E, H&S consultant can help you in determining whether a particular material is a hazardous waste.

Many types of solid waste may require special handling, such as residues from spill cleanups (used oil absorbent material), spent degreasers, used oil, oil filters, outdated chemicals, PCBs (capacitors, fluorescent light ballasts), batteries, mercury relays, lead, and other metal-containing materials. Before disposing of any of these, contact GEHS for guidance.

Although wooden utility poles are not regulated as hazardous waste, Verizon is concerned that others may use poles in an inappropriate or otherwise unsafe fashion. Verizon has therefore established a policy that prohibits selling or

giving away poles. (Exception: governmental entities may request and receive used utility poles. Forms and information can be found in InfoPoint® Document 8616 [*Transfer Of Used Utility Poles*]). Your regional Global E, H&S consultant can provide up-to-date information about the management of retired utility poles.

You must keep the amount of hazardous waste generated at your facility as small as possible. Hazardous waste is expensive to dispose of, and the more you generate, the more regulatory requirements you have to meet. You must also limit the amount of time hazardous waste is stored at your location. Regulations require most generators to ship their hazardous waste off site within 90 days, using licensed transporters and disposal firms. To schedule a waste shipment, contact Global E, H&S on the 24-Hour Hotline at 1-800-386-9639.

Different types of waste or incompatible waste should never be mixed. Mixing waste may change the regulatory status of certain waste.

Each drum/container of hazardous waste must be labeled with the words "*Hazardous Waste*" and indicate the contents. Marking can be done with labels obtained from Environment Management or using indelible markers. Labeling must be clearly visible for inspection and be dated when wastes are first placed in the drum/container, and when it is full.

State and local regulations are generally more stringent than the federal rules. For specific requirements in your area, contact the regional Global E, H&S consultant.

Certain states may require employees who work with Hazardous Waste take annual Hazardous Waste Training, a Hazardous Waste Generator course is available at VZ Learn the course number is SKL43080. Contact Global E, HS if you have any questions or need additional information.

What you need to do:

1. Use good housekeeping to reduce the amount of waste stored at a site. Return unopened containers to the manufacturer whenever possible.
2. Try to reduce the amount of waste created through careful handling of materials and efficiently using products. Recycle and reuse products whenever possible.
3. Make sure any drum that contains hazardous waste is clearly labeled, kept closed, and is not leaking. Inspect drums on a weekly basis.
4. Make sure that any wastes requiring special handling are identified, and that everyone working in the area knows how to manage them. This applies to any chemicals, degreasers and petroleum products.
5. Never mix wastes.
6. If you need advice on disposing of any solid waste, contact your regional Global E,H&S consultant or call the 24-Hour Hotline at 1-800-386-9639.
7. If you need to dispose of a hazardous waste, or regulated waste, call the 24-Hour Hotline at: 1-800-386-9639.
8. Don't bring household hazardous wastes from home into your workplace.
9. There are civil and criminal penalties for failure to promptly report spills that contaminate; **if in doubt, report it** by calling the 24-Hour Hotline at 1-800-386-9639.

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For assistance from an EH&S Professional, visit

Global Environmental, Health and Safety Compliance

Global E,H&S Contact Map

Global E,H&S 24-Hour Hotline 1-800-386-9639

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APPENDIX C

Guidance Document for Field Staff on Manhole Water and Sediment Removal

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Manhole Water and Sediment Removal – Document 8517

General Information

Various contaminants may accumulate in a manhole such as petroleum products, lead and sewage. Certain precautions should be taken In order to protect you and the environment from these contaminants.

Regulatory Requirements

Discharge of contaminated water or sediment onto the street, into a storm drain or into the environment is prohibited by law.

Caution

Do not pump water from a manhole if the manhole water appears to be contaminated with materials such as sewage, petroleum (oil, gasoline, diesel) or other chemicals. Immediately contact your supervisor and the **Safety, Health and Environmental Hotline at 1-800-386-9639**. Choose option 2 to report the incident. An Environmental Affairs staff member will coordinate the appropriate response. For additional information on this subject, refer to the Manhole Water & Sediment Removal Practice, National Operation Doc. No.: 2001-00690-OSP, issued 11/2/2001.

Manhole de-watering Procedures

Purging, Ventilation and Testing of Manholes

Before you start work in a manhole, you must adhere to the procedures outlined in Verizon's practice for purging, ventilating, and testing manholes. In Virginia, you must also comply with the state OSHA plan titled "VA Confined Space Standard for the Telecommunications Industry."

Unusual Conditions

After the manhole has been purged and tested, you must assess its contents to decide if it is safe to work in the manhole. As you assess the manhole, take special notice of anything unusual, such as exceeding the lower explosive limit (LEL), or the presence of sewage, gasoline or any other contaminants that could make the manhole unsafe. If you have reasons to believe it is unsafe to work in the manhole, do not enter or pump the manhole. Rather, you must immediately contact your supervisor and the Safety, Health and Environmental Hotline at 1-800-386-9639.

Manhole Surface Shines

If you notice a sheen (rainbow) or small surface contamination from roadway runoff, use absorbent pads or Imbiber Beads Pillows to remove the sheen. You can obtain the pads or pillows through the Outside Plant Products Catalogue using PID/SIS# 000986679 in the east and #912149 in the west. After the sheen has been removed, the manhole may be de-watered. Place used pillows into a plastic bag and bring them back to the garage or your work location for disposal. Training videos are available to indicate how the pillows are to be used. Contact the video library at 1-800-386-9639, option #6 to obtain copies of the training videos.

De-watering and Sediment Removal

Prior to dewatering the manhole, ensure that the pump is raised at least 3 inches above the manhole sediment. If the pump has been retrofitted with a device that automatically elevates the pump 3 inches above the sediment; you may lower the pump to the bottom of the manhole and start pumping. The 3-inch rule does not currently apply in CA and HI due to state discharge permit restrictions. In these locations you must follow Manhole Waste Water Practice 122-22001 and Batteries CO & Remote

Installation & Maintenance Practice 628-025-016. If during the manhole pumping you notice sediment being discharged, stop pumping at once and raise the pump before continuing to pump. After the manhole has been dewatered, you need to assess the sediment and decide if you can work in the manhole without the need to remove it. The first preference is to work around the sediment. This can be achieved by moving the sediment away from plant equipment or by using a work platform. There is no regulatory or corporate requirement to remove the sediment. If you can work with the sediment in place, no further action is required. If the sediment obstructs plant equipment and must be removed, have your supervisor contact the SH&E 24-Hour Hotline on 800-386-9639 to arrange for sediment testing and removal.

For non-emergencies, the manhole sediment must be sampled before any sediment removal is done. If you need immediate access to the manhole, the cost associated with immediate removal of sediment will be charged back to the requesting department. SH&E will absorb the cost of testing and removing only sediment considered to be hazardous waste. Sediment that tests as non-hazardous can be removed by an OSP general contractor.

What you need to do:

1. Purge, test, and ventilate the manhole according to the procedures outlined in the company practices.
2. Inspect the manhole and check for anything unusual, such as odors, leaks, sewage or petroleum contamination.
3. If the water is clean, pump the water by lowering the pump 3 inches above the manhole sediment. (Must follow local practices in CA & HI).
4. If you see sheen (rainbow) on the surface of the water, use absorbent pads or Imbiber Beads Pillows to remove it. Place the used pillows in the plastic bags provided and bring them back to the garage or your work location for disposal. Then you may proceed to pump the manhole as explained in item 3.
5. If more severe petroleum contamination exists call the SH&E 24-Hour Hotline.
6. If sediment does not obstruct plant equipment, complete the work with the sediment in place.
7. If sediment hinders work and must be removed, have your supervisor contact the SH&E 24-Hour Hotline to arrange for sediment testing and removal.

24-Hour
Safety, Health and Environmental
Hotline
1-800-386-9639, option #2

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APPENDIX D

Underground Structure Inspection Form and Discharge Log

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			P = Present NP = Not Present										
Date	Time	Manhole Number or Location by Address	Explosive Reading	Oxygen Deficiency	Toxic Gases	Visible Risk	Acid/Base Risk	Fluoride Risk	Petroleum/solvent	Hydrogen Sulfide	Nitrite Risk	Employee Name or Number

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